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March 18, 2021

**Via ECF**

The Honorable Lorna G. Schofield  
Courtroom 1106  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Henao v. Parts Authority*, Case No. 1:19-cv-10720-LGS-BM**

Dear Judge Schofield,

Pursuant to the Court's March 11, 2022 Order to Provide Billing Records, ECF No. 203, please find attached copies of Plaintiffs' billing records documenting, for each attorney, the date, the hours expended, and the nature of the work done.

Plaintiffs' counsel did not contemporaneously record all time due to Plaintiffs' counsel's belief that this case would ultimately settle with Plaintiffs' counsel receiving a substantially negative lodestar. This belief has proven correct, as the fees Plaintiffs' counsel seek in this matter are a fraction of the fees incurred. Thus, for example, there are no billing entries for multiple depositions that Plaintiffs' counsel traveled out of state to defend (Jeremiah Frei-Pearson traveled to Washington, D.C. and to Maryland to prepare clients for deposition and to defend the depositions in person). As another example, Plaintiffs' counsel finalized the *Cheeks* letter on January 21, 2022 and did not receive final directive to file from all Plaintiffs until March 2, 2022. During that time, Plaintiffs' counsel had additional communications with Plaintiffs which were not recorded in Plaintiffs' billing records, due to the settlement. Plaintiffs' counsel does not submit any billing records of any time that was not contemporaneously recorded. However, as officers of the Court, Plaintiffs' counsel estimate that counsel spent well over 50 hours on this matter that was not recorded.

Attached as Exhibit 1 is a copy of Finkelstein, Blankinship, Frei-Pearson, & Garber's billing records on this matter. Attached as Exhibit 2 is a copy of Mark Potashnick's billing records on this matter. Plaintiffs' counsel are aware of Your Honor's Individual Rules I.B.1. which directs that communications with Chambers not exceed two pages, including exhibits. Plaintiffs' counsel respectfully requests leave to file a communication with exhibits that exceeds two pages because Plaintiffs' counsel's billing records exceed two pages.

We thank Your Honor for your attention to this matter.

Respectfully submitted,

/s/Jeremiah Frei-Pearson

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cc: All counsel of record (Via ECF)